

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

KENDRICK SCOTT,

Plaintiff,

-against-

DETROIT POLICE DEPARTMENT
("DPD") SERGEANT WAYNE
PRITCHETT; DPD OFFICER
CATHERINE ADAMS; DPD OFFICER
BARBARA SIMON; and DPD OFFICER
ANTHONY JACKSON,

Defendants.

No. 19 Civ. 12718

**DECLARATION OF NICK BOURLAND IN SUPPORT OF PLAINTIFF
KENDRICK SCOTT'S OPPOSITION TO DEFENDANTS' PARTIAL
MOTION FOR SUMMARY JUDGMENT**

NICK BOURLAND declares under penalty of perjury pursuant to 28 U.S.C.
§ 1746, that the following is true and correct:

1. My name is Nick Bourland. I am affiliated with the law firm of
Emery Celli Brinckerhoff Abady Ward & Maazel LLP, counsel for Plaintiff
Kendrick Scott. I submit this declaration in support of Plaintiff's opposition to
Defendants' Motion for Partial Summary Judgment

2. Attached as **Exhibit A** is a true and accurate copy of the transcript of
the March 12, 2020 deposition of Kendrick Scott.

3. Attached as **Exhibit B** is a true and accurate copy of the transcript of the March 13, 2020 deposition of Elizabeth Walker.

4. Attached as **Exhibit C** is a true and accurate copy of the transcript of the July 23, 2020 deposition of Curtis Williams.

5. Attached as **Exhibit D** is a true and accurate copy of the Roseville Police Department records and July 3, 1998 divorce complaint concerning William Kindred.

6. Attached as **Exhibit E** is a true and accurate copy of the transcript of the May 4, 2020 deposition of Jodi Gonterman.

7. Attached as **Exhibit F** is a true and accurate copy of the Detroit Police Department's May 10, 1999 witness statement of Jodi Gonterman from the Lisa Kindred homicide investigation.

8. Attached as **Exhibit G** is a true and accurate copy of the transcript of the July 17, 2020 deposition of Defendant Anthony Jackson.

9. Attached as **Exhibit H** is a true and accurate copy of the transcript of the July 20, 2020 deposition of Lakeniya Hicks.

10. Attached as **Exhibit I** is a true and accurate copy of the transcript of the July 22, 2020 deposition of Lameda Thomas.

11. Attached as **Exhibit J** is a true and accurate copy of the transcript of the March 13, 2020 deposition of William Kindred.

12. Attached as **Exhibit K** is a true and accurate copy of the transcript of the June 25, 2020 deposition of Charmous (“C.J”). Skinner, Jr.

13. Attached as **Exhibit L** is a true and accurate copy of the Detroit Police Department’s May 9, 1999 witness statement of William Kindred from the Lisa Kindred homicide investigation.

14. Attached as **Exhibit M** is a true and accurate copy of Defendant Adams’s Investigator’s Report from the Lisa Kindred homicide investigation.

15. Attached as **Exhibit N** is a true and accurate copy of the transcript of the March 12, 2020 deposition of Justly Johnson.

16. Attached as **Exhibit O** is a true and accurate copy of the transcript of the August 11, 2020 deposition of Antonio Bernette.

17. Attached as **Exhibit P** is a true and accurate copy of the transcript of the June 29, 2020 deposition of Frank Scola.

18. Attached as **Exhibit Q** is a true and accurate copy of the Preliminary Complaint Record (police report) written by DPD Officer Frank Scola on May 9, 1999.

19. Attached as **Exhibit R** is a true and accurate copy of the transcript of the April 15, 2019 deposition of Defendant Catherine Adams (who now uses her married name, Tuttle).

20. Attached as **Exhibit S** is a true and accurate copy of the transcript of the July 16, 2020 deposition of Defendant Catherine Adams (who now uses her married name, Tuttle).

21. Attached as **Exhibit T** is a true and accurate copy of the Detroit Police Department's May 9, 1999 witness statement of Raymond Jackson from the Lisa Kindred homicide investigation.

22. Attached as **Exhibit U** is a true and accurate copy of the Detroit Police Department's May 9, 1999 witness statement of Plaintiff Kendrick Scott from the Lisa Kindred homicide investigation.

23. Attached as **Exhibit V** is a true and accurate copy of the Preliminary Complaint Record (police report) written by DPD Officer Rodney D. Jackson on May 9, 1999.

24. Attached as **Exhibit W** is a true and accurate copy of the transcript of the July 21, 2020 deposition of Defendant Wayne Pritchett.

25. Attached as **Exhibit X** is a true and accurate copy of the constitutional notification of rights form signed by Antonio Bernette while he was in DPD custody on May 9, 1999.

26. Attached as **Exhibit Y** is a true and accurate copy of the Detroit Police Department's May 9, 1999 witness statement of Antonio Bernette from the Lisa Kindred homicide investigation.

27. Attached as **Exhibit Z** is a true and accurate copy of the transcript of the January 11, 2000 testimony of Raymond Jackson at Justly Johnson's criminal trial.

28. Attached as **Exhibit AA** is a true and accurate copy of the Detroit Police Department's May 10, 1999 witness statement of Raymond Jackson from the Lisa Kindred homicide investigation.

29. Attached as **Exhibit BB** is a true and accurate copy of the transcript of the July 20, 2020 deposition of Defendant Barbara Simon.

30. Attached as **Exhibit CC** is a true and accurate copy of the Complaint (Request for Action) signed by Defendant Barbara Simon on May 11, 1999.

31. Attached as **Exhibit DD** is a true and accurate copy of the May 12, 1999 order of the Circuit Court for the Third Judicial Circuit of Michigan, Family Division, regarding Falynn Kenner.

Dated: April 5, 2021
New York, New York

/s/
NICK BOURLAND